

JENNY M. MADKOUR, COUNTY ATTORNEY
FOR MULTNOMAH COUNTY, OREGON
Christopher A. Gilmore, OSB No. 980570
Senior Assistant County Attorney
501 S.E. Hawthorne Blvd., Suite 500
Portland, Oregon 97214
Telephone: (503) 988-3138
Facsimile: (503) 988-3377
E-mail: chris.gilmore@multco.us
Of Attorneys for Defendant Multnomah County

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Portland Division

LESTER WRECKSIE,

Plaintiff,

v.

MULTNOMAH COUNTY, CITY OF
PORTLAND, and JOHN DOES 1-12,

Defendants.

Civil Case No. 3:22-cv-00891-YY

DEFENDANT MULTNOMAH
COUNTY'S OFFER TO ALLOW
JUDGMENT

Pursuant to Fed. R. Civ. P. 68(a), Defendant Multnomah County hereby offers to settle this matter and allow entry of judgment in favor of Plaintiff and against Defendant Multnomah County in the sum of \$5,002.00 (Five Thousand Two Dollars and 00/100), plus reasonable, legally recoverable attorney fees and costs accrued by the Plaintiff through the date of service of

Page 1 – DEFENDANT MULTNOMAH COUNTY'S OFFER TO ALLOW JUDGMENT

this Offer to Allow Judgment and attributable to Plaintiff's claims against Defendant Multnomah County. Recoverable costs and attorney fees shall be determined by the Court in accordance with Fed. R. Civ. P. 54 and L.R. 54.

This offer may be accepted by Plaintiff within 14 days after service. If this offer is not accepted within 14 days after service, it shall be deemed to be revoked. Pursuant to Fed. R. Civ. P. 68, this offer is not to be construed as an admission for any purpose.

Dated this 3rd day of January, 2023.

JENNY M. MADKOUR, COUNTY ATTORNEY
FOR MULTNOMAH COUNTY, OREGON

/s/ Christopher A. Gilmore

Christopher A. Gilmore, OSB No. 980570
Senior Assistant County Attorney
Of Attorneys for Defendant Multnomah County

ACCEPTED:

By signing below, Plaintiff hereby accepts this offer to allow judgment.

Dated this _____ day of January, 2023.

Lester Wrecksie
Plaintiff

Juan Chavez, OSB No. 136428
Plaintiff Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2023, I served the foregoing **DEFENDANT**

MULTNOMAH COUNTY'S OFFER TO ALLOW JUDGMENT on:

Juan C. Chavez
Franz Bruggemeier
Oregon Justice Resource Center
PO Box 5248
Portland, Oregon 97208
Email: jchavez@ojrc.info
fbruggemeier@ojrc.info

by the following method or methods as indicated:

- (**X**) by **mailing** to said person(s) a true copy thereof, said copy placed in a sealed envelope, postage prepaid and addressed to said person(s) at the last known address for said person(s) as shown above, and deposited in the post office at Portland, Oregon, on the date set forth above.
- (**X**) by causing a true copy thereof to be **emailed** to said person(s) at the last known address for said person(s) as shown above, on the date set forth above.
- () by mailing via **certified mail, return receipt requested**, to said person(s) a true copy thereof, said copy placed in a sealed envelope, postage prepaid and addressed to said person(s) at the last known address for said person(s) as shown above, and deposited in the post office at Portland, Oregon, on the date set forth above.
- () by **facsimile** to said person(s) a true copy thereof at the facsimile number shown above, which is the last known facsimile number for said person(s) on the date set forth above. A copy of the confirmation report is attached hereto.

/s/ Christopher A. Gilmore

Christopher A. Gilmore
Senior Assistant County Attorney